

## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

## REGION 7 901 NORTH 5TH STREET KANSAS CITY, KANSAS 66101 APR 2 0 2012

Stephanie Hirner Supervisor, Air Permits and Compliance Westar Energy, Inc. 818 S Kansas Avenue PO Box 889 Topeka, Kansas 66601-0889

RE:

Request to use Jeffrey 3 CAM-NSPS indicators for Jeffrey 1 between ESP rebuild and

development of new CAM-NSPS Plans

Dear Ms. Hirner:

On April 17, 2012, we received a request from Westar Energy to use the approved Jeffrey 3 NSPS Alternative Monitoring Plan for Jeffrey 1 between the time the ESP is rebuilt and the revised CAM plan is submitted. Westar seeks this interim approval because once the ESP is rebuilt for Jeffrey 1, the parameters used to identify excess emissions in the current NSPS monitoring plan, which also serves as the CAM plan, may no longer be valid. Likewise, because the Jeffrey 1 ESP rebuild will be similar to that for Jeffrey 3, the parameters used for compliance assurance for that unit are likely to be more representative during this interim period. Once Westar completes the Jeffrey 1 ESP rebuild, it will perform full testing on the unit and submit a new NSPS-CAM plan.

EPA concurs with Westar's recommendation to use the Jeffrey 3 compliance indicators for Jeffrey 1 until the new CAM plan is submitted and approved by KDHE. At that time, EPA will also evaluate the new compliance indicators and consider revising the current NSPS Alternative Monitoring Plan for Jeffrey 1.

If you have any questions, please contact Jon Knodel of my staff at (913) 551-7622 or knodel.jon@epa.gov.

Sincerely,

Mark Smith

Chief, Air Permitting and Compliance

cc:

Russ Brichacek

Kansas Department of Health and Environment

